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April 29, 2013

**VIA EMAIL (Schofield\_NYSDChambers@nysd.uscourts.gov.)**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: 1:10-cv-03959, *Kriss et al v. BayRock Group LLC et al*,  
Request for Extension of Time to Submit Objections to  
Filing of First Amended Verified Complaint

Dear Judge Schofield:

This office represents defendants Bayrock Group LLC, Bayrock Spring Street LLC, Bayrock Whitestone LLC, Bayrock Camelback LLC, and Bayrock Merrimac LLC (collectively herein, "Bayrock"). On April 22, 2013, this Court ordered that counsel for plaintiffs send the undersigned copies of the Verified Complaint and First Amended Verified Complaint ("FAC") no later than April 25, 2013 for Bayrock to review and determine its position regarding whether the FAC is appropriate for filing. This Court ordered that Bayrock submit a letter response by Thursday, May 2, 2013.

We have received the Verified Complaint and FAC from plaintiff's counsel. The FAC is 164 pages long, containing 778 paragraphs. It also contains 35 pages of exhibits.

Given the extreme length of the FAC and the vast amounts of privileged and confidential materials referenced, it would be difficult, if not impossible, for Bayrock enumerate its objections by May 2, 2013. We respectfully request an extension of time to respond until May 9, 2013

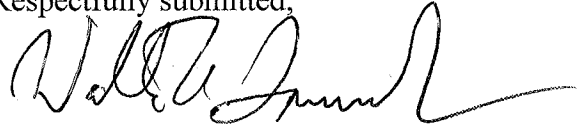
SATTERLEE STEPHENS BURKE & BURKE LLP  
The Honorable Lorna G. Schofield  
April 29, 2013

Page 2

Plaintiffs' counsel has consented to Bayrock's adjournment request.

No previous requests have been made for this relief.

Respectfully submitted,



Walter A. Saurack

WAS/jc

cc: Frederick M. Oberlander, Esq. (via e-mail [fred55@aol.com](mailto:fred55@aol.com))  
Michael P. Beys, Esq. (via e-mail, [mbeys@beysstein.com](mailto:mbeys@beysstein.com))

Application granted. Counsel for Defendants Bayrock Group LLC, Bayrock Spring Street LLC, Bayrock Whitestone LLC, Bayrock Camelback LLC and Bayrock Merrimac LLC shall submit a letter to the Court no later than May 9, 2013 including the information listed in the Court's Order dated April 22, 2013 (Dkt. No. 34).

**SO ORDERED**

  
HON. LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Dated: April 29, 2013  
New York, New York